National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



April 1, 2010

Reply to Attn of:

General Law Practice Group

TO:

Distribution

FROM:

Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the Women In

Aerospace Reception on April 13, 2010

On April 13, 2010, Women In Aerospace (WIA), a non-profit organization under 501(c)(4) of the Internal Revenue Code, and co-sponsors ATK, Booz Allen Hamilton, ITT, Lockheed Martin, Teaching Science & Technology, Inc., and Sierra Nevada Corporation, will host a reception at the Broadmoor Hotel, in Colorado Springs, CO, from 5:00 p. m.-7:00 p.m.

The reception will be attended by representatives of the aerospace industry, trade associations, the media, Congress, academia, Federal agencies, and NASA personnel. Approximately 1,252 people have been invited and are expected to attend. The estimated cost of the reception, which includes all food and beverages is \$35.00 per person. I find that the reception meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. §2635.204(g)(2). This event will allow NASA employees the opportunity to discuss NASA's space program with other people who are interested in aerospace issues. I have determined that free attendance at the above-mentioned reception is in the interest of the agency because it will further agency programs and operations.

However, NASA employees in non-career positions for which the Executive Order 13490 requires signing an ethics pledge may only attend if they reimburse the event sponsors the cost of the reception for themselves and accompanying guests. Moreover, NASA employees whose duties may substantially affect the event sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

of Adam F. Greenstone